# EXHIBIT D

## Part 573 Safety Recall Report

20V-561

Manufacturer Name: Volkswagen Group of America, Inc.

Submission Date: SEP 16, 2020 NHTSA Recall No.: 20V-561 Manufacturer Recall No.: 01E9



#### **Manufacturer Information:**

Manufacturer Name: Volkswagen Group of America, Inc.

Address: 3800 Hamlin Road

Auburn Hills MI 48326

Company phone: 1-800-893-5298

#### **Population:**

Number of potentially involved : 23 Estimated percentage with defect : 100 %

#### Vehicle Information:

Vehicle 1: 2018-2018 Volkswagen GOLF R GP

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: "Recalled vehicles are vehicles with special internal manufacturing codes identifying

the vehicles as subject to internal use and certain documentation requirements. Volkswagen has determined that documentation of these vehicles' actual build status may be incomplete or could not be verified. It is also possible that modification(s)

were made to these vehicles during their internal use period for which

documentation may be incomplete or could not be verified.

GOLF R GP Vehicle Count: 1"

Production Dates: SEP 29, 2017 - SEP 29, 2017

VIN Range 1: Begin: WVWWF7AUXJW074897 End: WVWWF7AUXJW074897 ☐ Not sequential

Vehicle 2: 2017-2017 Volkswagen GOLF ALLTRACK

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: "Recalled vehicles are vehicles with special internal manufacturing codes identifying

the vehicles as subject to internal use and certain documentation requirements. Volkswagen has determined that documentation of these vehicles' actual build status may be incomplete or could not be verified. It is also possible that modification(s)

were made to these vehicles during their internal use period for which

documentation may be incomplete or could not be verified.

GOLF ALLTRACK Vehicle Count: 2"

Production Dates: MAR 20, 2017 - MAR 20, 2017

VIN Range 1: Begin: 3VWM17AU9HM521121 End: 3VWM17AUXHM521306 ✓ Not sequential

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Vehicle 3: 2017-2017 Volkswagen E-GOLF GP

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: "Recalled vehicles are vehicles with special internal manufacturing codes identifying

the vehicles as subject to internal use and certain documentation requirements. Volkswagen has determined that documentation of these vehicles' actual build status may be incomplete or could not be verified. It is also possible that modification(s)

were made to these vehicles during their internal use period for which

documentation may be incomplete or could not be verified.

E-GOLF GP Vehicle Count: 2"

Production Dates: OCT 05, 2017 - NOV 20, 2017

VIN Range 1 : Begin : WVWPR7AU6HW953903 End : WVWPR7AU6HW954243 ✓ Not sequential

Vehicle 4: 2016-2018 Volkswagen PASSAT GP

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: "Recalled vehicles are vehicles with special internal manufacturing codes identifying

the vehicles as subject to internal use and certain documentation requirements. Volkswagen has determined that documentation of these vehicles' actual build status may be incomplete or could not be verified. It is also possible that modification(s)

were made to these vehicles during their internal use period for which

documentation may be incomplete or could not be verified.

PASSAT GP Vehicle Count: 12"

Production Dates: OCT 27, 2015 - DEC 15, 2017

VIN Range 1 : Begin : 1VWCS7A37GC005209 End : 1VWAA7A32JC014532 Not sequential

Vehicle 5: 2018-2018 Volkswagen ATLAS

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: "Recalled vehicles are vehicles with special internal manufacturing codes identifying

the vehicles as subject to internal use and certain documentation requirements. Volkswagen has determined that documentation of these vehicles' actual build status may be incomplete or could not be verified. It is also possible that modification(s)

were made to these vehicles during their internal use period for which

documentation may be incomplete or could not be verified.

ATLAS Vehicle Count: 6"

Production Dates: SEP 25, 2017 - DEC 16, 2017

VIN Range 1: Begin: 1V2AP2CA5JC520550 End: 1V2NR2CA7JC539189 ✓ Not sequential

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## **Description of Noncompliance:**

Description of the Volkswagen has determined that certain internal use vehicles were sold Noncompliance: without confirmation that they were built to Volkswagen's series production

standards and applicable regulatory requirements, and that documentation about their build status may be incomplete or could not be verified. It is also

possible that modification(s) were made to these vehicles during their internal use period for which documentation may be incomplete or could not be

verified. Volkswagen is not aware of any accidents or injuries as a result of this

issue.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: Due to the potential inclusion of non-standard components, missing

documentation of the actual build status and unknown potential for modifications made during internal use, Volkswagen cannot specifically identify a safety risk. Volkswagen is not aware of any accidents or injuries as

a result of this issue.

Description of the Cause: The established processes to ensure complete documentation of build status

and/or modification(s), if any, made during internal vehicle use were not

properly followed.

Identification of Any Warning NR

that can Occur:

#### **Involved Components:**

Component Name 1: NR

Component Part Number: NR

Component Description: NR

## Supplier Identification:

#### **Component Manufacturer**

Name: Volkswagen

Address: 3800 Hamlin Road

Auburn Hills MICHIGAN 48326

Country: United States

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## **Chronology:**

February 14, 2020 - June 20, 2020: Volkswagen Group of America Internal Audit Department performs an audit of internal use processes, following up on prior related audits focused on internal processes, to confirm that all vehicles produced or imported from January 2016 through December 2019 had been properly disposed or inspected, as warranted.

June 22, 2020: VWGoA Internal Audit completes analysis and internally publishes report.

July 1, 2020: VWGoA Internal Audit report was presented to the Product Safety Committee of Volkswagen AG. Additional details were requested to get a better understanding of the production build status or internal

September 9, 2020: Topic was presented to Product Safety Committee of Volkswagen AG. Decision to repurchase vehicles identified in the VWGoA Internal Audit report. The recall decision was not based on a confirmed safety risk but was based on incomplete documentation confirming that the subject vehicles complied with applicable standards. Vehicles may or may not be repairable with replacement parts or existing software updates.

## **Description of Remedy:**

Description of Remedy Program: Volkswagen will offer to repurchase these vehicles. Volkswagen will not

offer a reimbursement plan under this recall.

How Remedy Component Differs The affected vehicles are being recalled for repurchase and there is no

from Recalled Component: remedy component.

Identify How/When Recall Condition Volkswagen has taken additional steps to ensure that actual vehicle was Corrected in Production: configuration and compliance with applicable standards is known before a

vehicle is marketed.

#### Recall Schedule:

Description of Recall Schedule: Dealers/Owners: on or before November 13, 2020

Planned Dealer Notification Date: NOV 13, 2020 - NOV 13, 2020 Planned Owner Notification Date: NOV 13, 2020 - NOV 13, 2020

\* NR - Not Reported